

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:18 CR 513
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
vs.	)	
	)	<b><u>MOTION TO PERMIT TRAVEL</u></b>
TREVOR C. MARLYNE,	)	
	)	
Defendant.	)	

Now comes the Defendant, Trevor C. Marlyne, by and through undersigned counsel, Eric F. Long, Friedman & Nemecek, L.L.C., and hereby respectfully moves this Honorable Court to issue an order permitting Mr. Marlyne to travel outside of the State of Ohio, and, the County of Cuyahoga, respectively, for purposes of accompanying his partner, Dr. Alexandra Radu on an employment related trip to Minot, North Dakota. Specifically, Dr. Radu is completing her final year of residency as an oral maxillofacial surgeon and has received a job opportunity in Minot, North Dakota with Trinity Health. If Dr. Radu accepts this position, she and Mr. Marlyne, to the extent he is permitted, would move to North Dakota in June, 2019. Attached, as Exhibit A, are emails Trinity Health's physician recruiter, Shar Grigsby outlining the travel with itinerary documents. Defendant has discussed the travel plans with his U.S. Pretrial Service Officer, Mr. LaVecchia, and was advised that Mr. LaVecchia has no objections to this travel.

Additionally, Attorney Long and Assistant United States Attorney Howell have exchanged phone calls but unable to have a conversation regarding the Government's position. Due to the close proximity to the travel date we felt the need to file the Motion. We will continue to reach out to Assistant United States Attorney Howell to discuss the Government's position and advise the

court.

**WHEREFORE**, the Defendant, Trevor Marlyne respectfully requests that this Honorable Court modify the terms of his Court Supervised Released by permitting him to travel outside of the State of Ohio, and, the County of Cuyahoga, for the reasons stated herein.

Respectfully submitted,

/s/ Eric F. Long  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was filed by CM/ECF on the 21<sup>st</sup> day of September, 2018, which will send a notification of such filing electronically to the following:  
Assistant United States Attorney, 801 West Superior Avenue, Cleveland, Ohio 44113.

Respectfully submitted,

/s/ Eric F. Long  
ERIC C. NEMECEK  
ERIC F. LONG  
Counsel for Defendant